

From: [Jennings, Susan](#)
To: [Alessio Benni](#); [Hobgood, Sherada](#); [Thornton, Eleanor](#); [Baris, Reuben](#)
Cc: AskCVM@fda.hhs.gov; jamula.john@epa.gov; [Wasem, Russell](#)
Subject: RE: QUESTION ABOUT RODENTICIDE
Date: Thursday, September 12, 2013 10:37:44 AM
Attachments: [image001.png](#)

Dr. Benni:

I am forwarding your email to Meredith Laws, who is the Chief of our Insecticide-Rodenticide Branch. Her branch will be able to provide you with a complete and accurate answer to your question.

Sincerely,

-

Susan Jennings
Public Health Coordinator, Office of Pesticide Programs
US Environmental Protection Agency
(706) 355-8574 (v)
(706) 355-8744 (f)

From: Alessio Benni [mailto:alessio.benni@colkim.it]
Sent: Thursday, September 12, 2013 10:20 AM
To: Hobgood, Sherada; Jennings, Susan; Thornton, Eleanor; Baris, Reuben
Cc: AskCVM@fda.hhs.gov; jamula.john@epa.gov; Wasem, Russell
Subject: QUESTION ABOUT RODENTICIDE
Importance: High

Dear Sir/Madam

my name is Alessio Benni, Regulatory Dept. of Colkim srl, an Italian Company manufacturing and distributing biocides and relate equipments.

I contact you because of I have a question concerning the drugs in USA.

An Italian company that manufactures drugs has informed me is not possible to use rodenticides for USA market (paraffin blocks or other physical forms) containing the active ingredient brodifacoum (CAS number 56073-10-0) for the deratization of the manufacturing plant where produces drugs.

This is because of the active ingredient brodifacoum (CAS number 56073-10-0) is not listed in the glossary attached and updated in your website at this link

<http://www.fda.gov/Food/FoodborneIllnessContaminants/Pesticides/ucm113891.htm>

In Europe the active ingredient brodifacoum is used and authorized as active ingredient of rodenticides under **Biocides** Regulations (ex 98/8/EC Directive and 528/UE Regulation), but not authorized like Plant Protection Product under 1107/09

Regulation. So, my questions are:

1. Do you confirm is not possible to use rodenticides containing the active ingredient brodifacoum for the pest control (deratization) if the drugs will be market in USA?
2. It is possible, instead to use, for the scope above written, bromadiolone rodenticides baits (CAS number 28772-56-7)? It is instead listed in the glossary attached.
3. Considering the glossary of pesticide manual (June 2005) charged in your website, can I assume it how last version updated?

Thank you so much for your cooperation and help.

Best regards,

Dr. Alessio Benni

Responsabile controllo ed Assicurazione Qualità/Regulatory Affairs

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